

# Designations - Session # 1

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## ► Minimize Disruption

- Retain Existing Boundaries Where Possible
- Extension of Monitoring Data
- Use Additional Tools (e.g. modeling) to Site These Monitors



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- ▶ Consider Areas for Additional Requirements Without Designating Nonattainment
  - ▶ Do Not Neglect Background Values
  - ▶ Monitor Representativeness
    - Should Be Determined A Priori Through Experience
    - Include Transport Time Where Appropriate
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- ▶ Determine What Designation Is Used For
    - Informational
    - Intermediate
    - Local Prime Source
  - ▶ Define Areas as Part of SIP
  - ▶ Primary Consideration Must Be Public Health and Welfare
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- ▶ Identify Source Areas and Fashion Designation Accordingly
  - Consider Source-Receptor Relationships
  - Ignore Political Boundaries
  - Prioritize - Consider Cost Effectiveness and Maximum Benefit



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- ▶ Initial Designation With Option to Adjust As Planning Process Takes Shape
  
  - ▶ Possible Scenarios Include
    - Too Close To Call
    - Unclassifiable
    - We Don't Know
    - Natural Events
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- ▶ Revisit Historical Designations
    - Use Previous Experience to Find Effective Solutions
  - ▶ De-Couple Control Strategy and Designation Process
  - ▶ Use One Designation Process and Allow Flexibility Through the Classification Process
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## ► Implications of Designation

- Economic Burden from Loss of Jobs
  - Conformity Kicks In
  - Requirements No Matter What
  - Difficulty in Attracting New Industry (e.g. Economic Growth)
  - Industry Automatically Looks Elsewhere
  - Negative Impression on Tourism
  - Becomes a Target for Lawsuits
  - Potential Lifestyle Changes
  - Increased Resources for Public Relations
  - Discourages Industrial Modernization
  - Federal Sanctions are a Possibility
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## ► Benefits of Designation

- Bona Fide Demonstration of Concern for Public Health and Welfare
  - Attract Cleaner Industry
  - Offsets as an Investment
  - Creates/Preserves Some Jobs
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# Session # 1 (Summary)

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- ▶ Encourage Flexibility
  - Multiple Designation Types
  - Less Restrictive
- ▶ Timing Issues
- ▶ Primary Designation for Health/Welfare Effects
- ▶ Separate Control Strategies from Designation Process
- ▶ Inform Public In Face of Uncertainty

